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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Lilia Elizabeth Haller,
Plaintiff, } Case No. 1:22-cv-01050-JLT-GSA
} STIPULATION AND ORDER FOR
} EXTENSION OF TIME

VS.

Kilolo Kijakazi, Acting
Commissioner of Social Security,

Defendant

Case No. 1:22-cv-01050-JLT-GSA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from January 31, 2023 to March 17, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of January 31, 2023 and February

1 6, 2023, Counsel currently has 32 merit briefs, and several letter briefs and reply
2 briefs. Additional time is needed to thoroughly brief this matter for the Court.

3 Counsel for Plaintiff is currently taking partial leave as his child was born on
4 October 14, 2022. Thus, Counsel is working limited hours for the months of
5 December 2022 through March 2023 (with a possible extension of parental leave).

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

8
9 Respectfully submitted,

10 Dated: January 26, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff

15
16 Dated: December __, 2022 PHILLIP A. TALBERT
17 United States Attorney
18 MATHEW W. PILE
19 Associate General Counsel
20 Office of Program Litigation
Social Security Administration

21
22 By: */s/ Ellinor R. Coder
23 Ellinor R. Coder
24 Special Assistant United States Attorney
25 Attorneys for Defendant
(*As authorized by email on Jan. 26, 2023)
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27
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ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: January 27, 2023

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE